

VIA ECFS

February 28, 2014

Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20554

ATTN: Wireline Competition Bureau

Re: WC Docket No. 10-90
Rural Broadband Experiment Expression of Interest - Rural Areas
Planters Communications, LLC

Dear Ms. Dortch:

Planters Communications, LLC (PCOM) hereby expresses interest in participating in the Commission's rural broadband experiments to provide robust, scalable high-speed broadband to unserved high-cost areas with additional Connect America support. PCOM is a facilities-based Competitive Local Exchange Carrier (CLEC) in Georgia, providing voice and broadband services over an all fiber-optic network, and a wholly-owned subsidiary of Planters Rural Telephone Cooperative, an Incumbent Local Exchange Carrier (ILEC) serving portions of Screven and Effingham counties in Georgia since 1951. While, PCOM does not have an Eligible Telecommunication Carrier (ETC) designation with the Georgia Public Service Commission (GPSC) at this time, if PCOM is awarded funding the necessary steps would be taken to meet the requirements set forth by the GPSC and the FCC.

Proposed Service Area

The experiment will provide Voice and Broadband service to eligible high-cost locations in unserved high-cost Census Blocks within these Census Tracts.

<u>State</u>	<u>County</u>	<u>County Name</u>	<u>Tract ID</u>	<u>Eligible High Cost Locations</u>	<u>Extremely High Cost Locations</u>
GA	13033	Burke	13033950400	139	12
GA	13033	Burke	13033950500	286	50
GA	13033	Burke	13033950700	621	59
GA	13165	Jenkins	13165960100	815	62

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Proposed Service Architecture

Consistent with the adequacy of support funds proposed, the following service architecture would be proposed:

- Voice and Broadband services with broadband transmission speeds of 15 Mbps downstream/3 Mbps upstream provided over fiber optic technology.

Project Timeline

PCOM already owns a fiber backbone in the proposed service area that it utilizes to provide backhaul services to CMRS carriers. It is anticipated that the construction of the necessary distribution fiber associated with this project could be underway within six months of funding.

Existing Providers

ATT-GA (f/k/a BellSouth Telecommunications) provides ADSL services to the majority of Burke County over older copper facilities, however its ADSL platform is not scalable to meet the future needs of the county. ATT-GA also has ADSL service available in limited portions of Jenkins County, again utilizing older copper plant. In both counties, however, ADSL coverage is not ubiquitous.

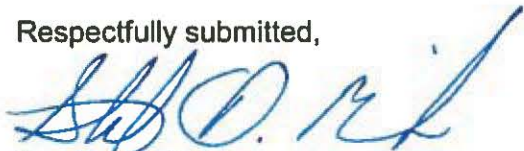
Funding

PCOM is self-funded. It does not contemplate delays due to efforts to secure outside financing to move forward with the project. Because the locations in the unserved high-cost census blocks within the selected Census Tracts have yet to be identified, PCOM is unable to fully estimate its construction costs and amount of funding needed. The total scope of costs for the project will be identified if and when a formal proposal is submitted. It does however, project a cost of \$27,000 per constructed fiber mile.

Planters Communications, LLC appreciates the opportunity to provide this non-binding expression of interest.

Please contact the undersigned with any questions.

Respectfully submitted,



Stephen D. Milner
General Manager/CEO